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September 1 1992

Mr Frazer Lockhart
U S Department of Energy
Rocky Flats Office
P O Box 928
Golden Colorado 80402-0928

RE Final Subsurface IM/IRA and Decision Document for OU 2 August 20 1992

Dear Mr Lockhart

The Colorado Department of Health Hazardous Materials and Waste Management Division (the Division) and the U S Environmental Protection Agency (EPA) have reviewed the above referenced document submitted by DOE and prime operating contractor EG&G The final version adequately addresses our concerns from the draft and both CDH and EPA hereby grant approval to the document

With regard to the issue of ARARs the Division is satisfied with the approach taken in the document This includes both the incorporation of the existing OU 1 and OU 2 IM/IRA ARARs into the document as well as the proposal of standards for constituents detected in the OU 2 ground water for which there were no existing ARARs We would like to point out two minor errors in the Appendix C ARAR tables that need to be corrected First there is already an ARAR of 1 ug/l for Chloroform proposed in the Walnut Creek IM/IRA The suggested value of 6 ug/l can be deleted Second there is no ARAR for Zinc in the Walnut Creek IM/IRA but the value listed 0 05 mg/l is the appropriate value to propose in this Subsurface IM/IRA

Additionally since DOE has recently resumed dialogue with CDH and EPA on a site-wide approach for ARARs we feel progress will be made on this issue in the near future

If you have any questions regarding these matters please call Joe Schieffelin at CDH (331-4421) or Bill Fraser at EPA (294-1081)

Sincerely

Gary W Baughman Chief
Facilities Section
Hazardous Waste Control Program

Martin Hestmark
Team Leader Rocky Flats Project
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cc Martin Hestmark EPA
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